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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

NO. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FEDERICO CERETTI, ET AL.

Defendants.

Adv. Pro. No. 09-1161 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND TO FOURTH
AMENDED COMPLAINT**

Upon the request of defendants Federico Ceretti, Carlo Grosso, FIM Advisers LLP, and
FIM Limited (together, the "FIM Defendants"), by and through their undersigned attorneys, for a

further extension of time beyond October 10, 2014, as provided by the “Stipulation Extending Time to Respond to Fourth Amended Complaint” [Doc #118]; and the respective counsel for the Trustee and the FIM Defendants having conferred; and the FIM Defendants having represented through their counsel that they will appear and defend (*i.e.*, not default), in this proceeding; it is hereby stipulated and agreed by and between the undersigned herein:

The deadline by which the FIM Defendants may move, answer or otherwise respond to the Fourth Amended Complaint is extended from October 10, 2014 up to and including December 9, 2014.

Nothing in this Stipulation is a waiver of any of the FIM Defendants’ right to request from the Court a further extension of the deadline set forth above and/or the Trustee’s right to object to any such request.

Undersigned counsel for the FIM Defendants expressly represent: (i) service of the Summons and Complaint in the above-captioned adversary proceeding was properly and timely effected upon them, and (ii) they have the authority to, and hereby waive any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of the FIM Defendants.

The parties to this Stipulation agree that entering into this Stipulation does not constitute submission by the FIM Defendants to the jurisdiction of this Court and, except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including to challenge the jurisdiction of the Court in this Court or any other court.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 7037) in the above-captioned case (No. 08-01789 (BRL)).

Dated: October 10, 2014
New York, New York

BAKER & HOSTETLER LLP

PAUL HASTINGS LLP

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